ORIGINAL

CKC LABORATORIES, INC. Testing the Future

TO : Federal Communications Commission
ATTN : Office of the Secretary
Washington, D.C. 20554

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FCC MAIL ROOM

FROM : CKC LABORATORIES, INC.
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RE : COMMENTS ON FCC NPRM DOCKET FILE COPY ORIGINAL
February 7, 1995
"Proposal to Amend Parts 2 and 15 to Deregulate the Equipment Authorization Requirements for Digital Devices"

Summary of CKC's position on Key Proposals (comments below)

(6) Proposal to present certification process with Declaration of Conformity	:	FAVOR
(7) Proposal to establish new labels to reflect changes in process	:	FAVOR
(8), (9) Proposal to Establish NIST/NVLAP as sole accreditation body	:	Do not favor
Proposal to Establish and/or recognize other accreditation processes	:	FAVOR
(10) Post Certification Sampling, Stepped up enforcement	:	No opinion
(14) - (22) Proposal to allow certification based on components	:	FAVOR*

*(Only if an Industry standard (similar to ANSI C63.4) can be developed)

BACKGROUND ON CKC LABORATORIES, INC.

CKC Laboratories, Inc. is a consulting and testing operation with 15 EMC laboratories in California and Oregon. Ten of these facilities are listed by the FCC as available for contract FCC testing, five are anechoic facilities dedicated to performing engineering tests and European immunity testing. CKC's customers range in size across the entire spectrum from small, startup organizations to very large organizations testing multiple products every quarter. Each year, CKC Laboratories performs commercial EMC certification tests on over 1500 products, to both U.S. and international EMC standards. CKC Laboratories, Inc. is dedicated exclusively to assisting our customers in meeting EMC requirements and solving EMC problems, and has provided these types of services since 1973.

COMMENTS ON NPRM 95-46

(6) CKC Laboratories, Inc. favors the use of a "Self-Declaration" or DoC for all FCC certifications. This process has been use in Europe by the VDE for Class B products for many years, and is the present Europe wide certification process for these products. The primary advantage to our customers is the ability to gain instant access to the market after positive test results. As a testing laboratory, we believe the proposal to eliminate the 4 to 6 week turnaround time for our customers will have a positive impact on our testing business through increased competitiveness and volume in the computer industry.

(7) A label to show compliance with the rules is the simplest way of quickly identifying non-compliant products. The present FCC identifiers are being used by some consumers, and advertised by some manufacturers to flush out very low quality (and non-compliant) Class B products. However, in a very

general comment, it would be highly desirable for our customers to achieve uniformity with other international labels. One suggestion would be for the FCC to recognize the CE Mark as an "equivalent" label to the FCC's own label when the product is accompanied by a Declaration of Conformity that specifically states that the FCC's certain provisions have also been met (such as testing to the ANSI C63.4 test setup).

(8) (9) CKC's primary objection to the proposal to require NVLAP accreditation is that this would create a monopoly for EMC laboratory accreditation in the United States. Compared to internationally recognized accreditations for laboratories (such as ISO 45000/EN45000, ISO Guide 25), NVLAP is very expensive, and CKC believes that NVLAP has been largely unsuccessful in its goal of improving the quality of its member EMC test laboratories due to a lack of knowledge and experience in international EMC testing. The selection of NVLAP as the sole accreditation body for the U.S. would be contradictory to the goal of maintaining quality through competition. For example, Germany has listed three agencies capable of performing EN45000 accreditations, and this accreditation is recognized throughout Europe (which means it could also be performed by any of the other agencies listed in the other European member states). Competition amongst accreditation bodies keeps the cost down, and provides some checks and balances on the practices of the accreditation organizations. In a more general discussion than is presented in the proceeding, CKC would not be opposed to establishing an EMC laboratory accreditation system for the U.S. This system for accreditation should include the following : (a) a listing of required quality standards (such as ISO45000), (b) a listing of at least three independent U.S. organizations authorized to perform the accreditations, (c) a listing of equivalent international accreditations and organizations that will be equivalent or acceptable to the Commission. Because CKC believes this will require some time to develop, and that the other proposals of this proceeding should move ahead, in the interim (until a competitive accreditation process can be established) CKC suggests the following : Presently, site attenuation data in accordance with ANSI C63.4 is required to be filed with the FCC every three years to maintain the FCC's listing. In the interest of maintaining more up to date information on these laboratories, CKC suggests that site attenuation data instead be submitted every year to the Commission. CKC also suggests that the Commission keep on file and make available to interested parties a one page letter from the testing organizations which describes more general information on the organization's experience and capabilities, and any quality practices or international accreditations the organization may hold.

(10) CKC Laboratories, Inc. understands that the Commission has an interest in enforcing the provisions of its rules. However, CKC Laboratories would like to suggest privatization of this audit practice, through the utilization of independent laboratories on a contract basis with the Commission (secured through a periodic qualified bidding process, such as on a two to five year contract basis). Also, CKC Laboratories suggests that companies who utilize internal audit sampling practices and incorporate EMC into an accredited overall quality process (such as ISO 9000), and who use an ISO 45000 or ISO Guide 25 accredited laboratories to make their audit measurements should be able to supply internal audit data to the commission in lieu of samples for testing.

(14) - (22) The proposals to allow a declaration of conformity based on the assembly of certified components is very complex. CKC Laboratories recommends that an industry standard similar to ANSI C63.4 be developed before any changes in the present rules with respect to this subject take effect. Because EMC is ultimately a real, system level requirement (the final product must not cause upset to communications) the industry standard committee should clearly demonstrate that the ultimate goal of EMC can be consistently achieved by a specific method of component level certification. ANSI C63.4 is a good example of the quality of industry standard that is needed before component based certification can realistically proceed with hope of achieving the goal of EMC based on component level measurements.

Additional Comments : CKC Laboratories, Inc. generally favors the proposed changes with respect to relaxing the authorization procedures. However, CKC Laboratories also believes that the technical requirements should be reviewed. The present day FCC Class B limits, or CISPR 22 Class B limits which may also be used, were developed some time ago with the intent of protecting communications. The NPRM makes several comments to the effect that the FCC has not observed widespread problems with digital devices and interference since the imposition of the rules in 1981. CKC believes that an investigation into the development of the FCC Class B limits with respect to modern day communications is warranted, with the possibility explored that these limits may be too tight in many frequency bands. For example, if in fact communications could be adequately protected by the FCC Class A limits, this would literally translate into billions of dollars in reduced design effort and measures implemented into products to suppress emissions.

CKC Laboratories, Inc. may be contacted at the above address, please send any reply / comments to the attention of Dennis Ward, Director of Laboratories.

Signed,

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